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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 THE ESTATE OF CHRISTOPHER ROSALES,
12 by and through RAMIRO ALVARADO-
13 ROSALES as Special Administrator; RAMIRO
13 ALVARADO-ROSALAS, individually, SADEE
14 GRACE ROSALES, A MINOR, by and through
14 BRYTTNY RAENE HENSON, her natural
15 parent and guardian, as assignees of CTD LABS,
15 LLC, a foreign limited liability company,

16 Plaintiffs,
17 v.

18 CERTAIN UNDERWRITERS AT LLOYDS OF
18 LONDON SUBSCRIBING TO POLICY
19 NUMBERS SAPHIRE BLUE, a series of RSG
19 UNDERWRITING MANAGERS, LLC, a
20 foreign limited liability company; DOES I
20 through X; and ROE CORPORATIONS I
21 through X,

22 Defendants.

Case No: 2:20-cv-00598-KJD-VCF

**STIPULATION AND [PROPOSED] ORDER
FOR EXTENSION OF TIME FOR
DEFENDANTS TO FILE RESPONSIVE
PLEADING TO PLAINTIFF'S FIRST
AMENDED COMPLAINT**

(First Request)

23 Plaintiffs, the Estate of Christopher Rosales, by and through Ramiro Alvarado-Rosalas as
24 Special Administrator, Ramiro-Alvarado-Rosales, individually, Sadee Grace Rosales, a minor, by
25 and through Bryttny Raene Hensen, her natural parent and guardian (collectively the "Plaintiffs"), by
26 and through their counsel of record, Jerome R. Bowen, Esq. of Bowen Law Offices; and Defendants,
27 Certain Underwriters at Lloyds of London Subscribing to Policy Numbers, and RSG Underwriting
28 Managers, LLC (erroneously sued as Saphire [sic] Blue, a series of RSG Underwriting Managers,

1 LLC) (“Defendants”), by and through their counsel of record, Chad C. Butterfield, Esq. of Wilson,
2 Elser, Moskowitz, Edelman & Dicker, LLP, hereby stipulate and agree to extend the deadline for
3 Defendants to file a responsive pleading to Plaintiffs’ First Amended Complaint by thirty (30) days,
4 from April 6, 2020 to **May 6, 2020**.

5 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the
6 requested extension. The ongoing concerns related to the COVID-19 pandemic and restrictions
7 imposed on social gathering have impacted the operations of Defendants and undersigned counsel’s
8 office, and have resulted in numerous logistical issues. Accordingly, the parties agree that the
9 requested extension furthers the interests of this litigation and is not being requested in bad faith or
10 to delay these proceedings unnecessarily.

11 This is the parties’ first request for extension of the deadline.

12 DATED this 6th day of April, 2020.

13 **WILSON, ELSE, MOSKOWITZ,
EDELMAN & DICKER LLP**

14 */s/ Chad C. Butterfield* _____
15 CHAD C. BUTTERFIELD
16 Nevada Bar No. 10532
17 300 South Fourth Street, 11th Floor
Las Vegas, NV 89101
Attorneys for Defendants

18 DATED this 6th day of April, 2020.

19 **BOWEN LAW OFFICES**

20 */s/ Jerome R. Bowen* _____
21 JEROME R. BOWEN, ESQ.
22 Nevada Bar No. 4540
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Las Vegas, NV 89129
Attorney for Plaintiffs

23 **ORDER**

24 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

25 Dated this 6th day of April, 2020.

26 
27 _____
28 UNITED STATES MAGISTRATE JUDGE